

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

KATYRECE S. HALL,)	
PLAINTIFF,)	
v.)	CASE #:2:06-cv-00588-MEF-WC
LEONARD ROSS CRANE,)	
MAYTAG SALES, .INC., and)	
factitious parties A - D,)	
DEFENDANTS.)	

UNOPPOSED MOTION TO CONTINUE

COME NOW the Defendants and herewith move this Court to continue this case from its presently scheduled June 4, 2007 trial term and as grounds show unto the Court the following:

Since filing this suit, Plaintiff has moved to Colorado where she is now employed and has received additional medical treatment. Additionally, Plaintiff was employed at Maxwell Air Force Base but has now transferred to another federal facility making it difficult to obtain her personnel records. The Defendant Leonard Ross Crane now resides and is employed in Texas and is not easily accessible. The parties, in good faith, have conducted discovery but because of the logistic difficulties associated with the location of their clients, have been unable to complete discovery. The parties will not be able to complete discovery by the discovery cutoff date. The parties are hopeful once the records have been obtained and depositions taken, they will be able to resolve this case.

Plaintiff's attorney advises she has no objection to this Motion to Continue.

WHEREFORE THESE PREMISES PRAYED, Defendants move this Court to continue this case to the next term or in the alternative, to extend the discovery cutoff date until May 11, 2007

/s/ *Randall Morgan*

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and Leonard Ross Crane
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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document via electronic filing and U.S. Mail, first-class postage prepaid, on this the 22nd day of March, 2007:

Carol Gerard, Esq.
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/s/ *Randall Morgan*

OF COUNSEL